

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

In Re:	:	Bankruptcy No. 19-13366-mdc
Hua Yeung	:	Chapter 13
	:	
Debtor	:	
MTGLQ Investors, LP c/o Rushmore Loan	:	
Management Services	:	
Movant	:	
vs.	:	
Hua Yeung	:	
	:	
Debtor/Respondent	:	
and	:	
William C. Miller, Esquire	:	
Trustee/Respondent	:	

OBJECTION TO CONFIRMATION OF THE PLAN

MTGLQ Investors, LP c/o Rushmore Loan Management Services (“Movant”), by its attorneys, Hladik, Onorato & Federman, LLP, objects to confirmation of the Chapter 13 Plan of Debtor, Hua Yeung (“Debtor”), as follows:

1. As of the bankruptcy filing date of May 24, 2019, Movant holds a secured Claim against the Debtor’s property located at 20 Morning Glory Way, Lower Moreland Township, PA 19006.

2. On July 31, 2019 Movant filed a Proof of Claim citing a secured claim in the amount of \$575,422.99, with pre-petition arrears in the amount of \$110,673.99.

3. The Plan currently proposes payment to Movant in the amount of \$100,000.00 for pre-petition arrears.

4. The Plan fails to cure the delinquency pursuant to 11 U.S.C. § 1322(b)(5).

5. The Plan violates of 11 USC § 1325(a)(5)(B)(ii) by not providing for Movant to receive the full value of its claim.

6. Movant objects to the feasibility of the Plan under 11 U.S.C. § 1325(a)(6). The Plan proposed by Debtor is not feasible. Movant requests that the bankruptcy case either be converted to a Chapter 7 or be dismissed pursuant to 11 U.S.C. § 1307.

WHEREFORE, Movant respectfully requests that this Honorable Court deny confirmation of the Debtor's Chapter 13 Plan.

Respectfully submitted,

Dated: 07/31/2019

/s/Danielle Boyle-Ebersole, Esquire
Danielle Boyle-Ebersole, Esquire
Hladik, Onorato & Federman, LLP
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Hua Yeung	:	
Debtor/Respondent	:	
and	:	
William C. Miller, Esquire	:	
Trustee/Respondent	:	

**CERTIFICATE OF MAILING OF OBJECTION TO THE PROPOSED
PLAN TO PARTIES IN INTEREST**

I, Danielle Boyle-Ebersole, Esquire, attorney for MTGLQ Investors, LP c/o Rushmore Loan Management Services (“Movant”), certify that I served a copy of the attached Objection to the Plan to the parties below on 07/31/2019:

Albert J. Scarafone, Jr., Esquire
Via Electronic Filing
Attorney for Debtor

William C. Miller, Esquire
Via Electronic Filing
Trustee

Date: 07/31/2019

Hua Yeung
20 Morning Glory Way
Huntingdon Valley, PA 19006-5449
Via First Class Mail

Debtor

Respectfully Submitted,
/s/Danielle Boyle-Ebersole, Esquire
Danielle Boyle-Ebersole, Esquire
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298 Wissahickon Avenue
North Wales, PA 19454
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